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4 P.O. Box 683  
Washington, D.C. 20044  
5 202-353-1857 (v)  
202-307-0054 (f)  
6 Boris.Kukso@usdoj.gov

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE EASTERN DISTRICT OF CALIFORNIA

9 )  
10 ) Case No. 2:21-cv-1964-WBS-CKD  
11 )  
12 ) UNITED STATES OF AMERICA,  
13 )  
14 ) Plaintiff,  
15 )  
16 ) v.  
17 )  
18 ) EDWARD T. KENNEDY,  
19 )  
20 ) Defendant.  
21 )  
22 )  
23 )  
24 )  
25 )

Case No. 2:21-cv-1964-WBS-CKD

**UNITED STATES' REQUEST FOR  
STATUS CONFERENCE OR  
HEARING ON MOTION FOR  
DEFAULT JUDGMENT**

16 The United States hereby notifies the Court that Defendant Kennedy has filed another  
17 false UCC Financing Statement against the IRS Commissioner; the United States also  
18 respectfully requests that the Court set a status conference or a hearing on the currently pending  
19 Motion for Default Judgment. ECF No. 13.

20 The United States filed this action to nullify a false lien Kennedy filed against the IRS  
21 Commissioner Charles P. Rettig and to enjoin any further such false filings Kennedy threatened  
22 to make against other IRS employees. ECF No. 1. Kennedy did not respond to the Complaint and  
23 did not respond to the United States' Motion for Default Judgment. On April 18, 2022, the  
24  
25

1 Court took the Motion for Default Judgment under submission without oral argument. ECF No.  
2 15.

3 Kennedy was notified of this case and chose not to participate in this suit. However, on  
4 July 6, 2022, Kennedy filed another false UCC Financing Statement with the Secretary of State,  
5 naming Charles P. Rettig as debtor. See Ex. 1.<sup>1</sup> Kennedy filed this new false UCC lien after  
6 being served with the summons and complaint, and after the Motion for Default Judgment was  
7 briefed and pending.

8 The United States hereby notifies the Court of this additional false UCC lien filing, and  
9 respectfully requests a status conference or a hearing on the Motion for Default Judgment so that  
10 the United States can provide any additional information the Court may require to reach its  
11 decision.

12  
13 Dated: August 31, 2022

14 DAVID A. HUBBERT  
15 Deputy Assistant Attorney General

16 /s/ Boris Kukso  
17 BORIS KUKSO  
18 Trial Attorney, Tax Division  
19 U.S. Department of Justice  
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<sup>1</sup> The UCC Financing Statement is also available via Secretary of State web at  
<https://bizfileonline.sos.ca.gov/search/ucc>

**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2022, I caused the Court's **UNITED STATES' REQUEST FOR STATUS CONFERENCE OR HEARING ON MOTION FOR DEFAULT JUDGMENT** to be mailed by United States Postal Service to the following:

Edward Kennedy  
800 Court St., #223  
Reading, PA 19601

/s/ Boris Kukso  
BORIS KUKSO  
Trial Attorney  
United States Department of Justice, Tax Division